

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KATHLEEN STONE,

Plaintiff,

v.

**PRESIDENT AND FELLOWS OF
HARVARD COLLEGE and JOHN
AND JANE DOES 1-50,**

Defendants.

Civil Action No. 1:24-cv-11897-LTS

JOINT STATUS REPORT

Plaintiff Kathleen Stone (“Plaintiff”), together with Defendant President and Fellows of Harvard College (“Defendant Harvard” and, collectively with Plaintiff, “the Parties”), by and through the undersigned counsel, and pursuant to the Court’s April 14, 2025 Scheduling Order [ECF No. 46], respectfully submit this Status Report in anticipation of the Status Conference scheduled in this matter on October 15, 2025.

1. Status of Discovery: Both Parties have served requests for production and interrogatory requests. At Plaintiff’s request, the Parties have agreed to serve responses and objections to written discovery requests on or before October 17, 2025. Both Parties anticipate that they will produce responsive documents on a rolling basis, with substantial completion of document production by the current December 19, 2025 deadline. Counsel for the Parties have begun to confer regarding the scheduling of depositions to commence following substantial completion of document production.

2. Dispositive Motion Practice: Defendant Harvard anticipates filing a motion for summary judgment after the close of discovery.

3. Expert Discovery: Plaintiff anticipates the use of experts regarding Plaintiff's claim for financial and emotional distress damages. Defendant Harvard anticipates the use of experts, including in response to Plaintiff's expert disclosures and reports. Counsel for the Parties are meeting and conferring regarding an expert discovery schedule.

4. Mediation: Counsel for the parties have conferred and are amenable to mediation following the deadline for substantial production of documents (December 19, 2025).

5. Other Issues Relevant to the Progress of the Case: Plaintiff anticipates sending third party subpoenas for the production of documents with responses due on or before the deadline for substantial production of documents (December 19, 2025). On September 26, 2025, Plaintiff submitted a motion to modify the Scheduling Order to extend the deadline to amend the pleadings from September 29, 2025 to November 13, 2025 (Dkt. 57). Defendant opposed the extension on October 6, 2025 (Dkt. 58).

Date: October 13, 2025
Boston, Massachusetts

NESENOFF & MILTENBERG, LLP
Attorneys for Plaintiffs Kathleen Stone

By: /s/ Tara J. Davis
Andrew T. Miltenberg, Esq.
(*pro hac vice*)
Gabrielle M. Vinci, Esq.
(*pro hac vice*)
363 Seventh Avenue, Fifth Floor
New York, New York 10001
(212) 736-4500
amiltenberg@nmlplaw.com
gvinci@nmlplaw.com

Tara J. Davis, Esq. (BBO No. 675346)
Regina M. Federico, Esq. (BBO No. 700099)
101 Federal Street, Nineteenth Floor

FOLEY HOAG LLP
*Attorneys for Defendant President and
Fellows of Harvard College*

By: /s/ Leah Rizkallah
Madeleine Rodriguez (BBO No. 684394)
Allison A. Anderson (BBO No. 687662)
Leah S. Rizkallah (BBO No. 696949)
Maureen S. Berry (BBO No. 712841)
155 Seaport Boulevard
Boston, Massachusetts 02210
(617) 832-1000
mrodriguez@foleyhoag.com
alanderson@foleyhoag.com
lrizkallah@foleyhoag.com
mberry@foleyhoag.com

Boston, Massachusetts 02110
(617) 209-2188
tdavis@nmllplaw.com
rfederico@nmllplaw.com

CERTIFICATE OF SERVICE

I, Tara J. Davis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be served upon anyone indicated as a non-registered participant.

/s/ Tara Davis
Tara J. Davis, Esq.